

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
JACKSON DIVISION**

**LATOYA BROWN; LAWRENCE BLACKMON  
HERBERT ANTHONY GREEN; KHADAFY MANNING;  
QUINETTA MANNING; MARVIN MCFIELD; NICHOLAS  
SINGLETON; STEVEN SMITH; BESSIE THOMAS; and  
BETTY JEAN WILLIAMS TUCKER, individually and on  
behalf of a class of all other similarly situated,**

**PLAINTIFFS**

**v.**

**CIVIL ACTION NO. 3:17-cv-347 WHB LRA**

**MADISON COUNTY, MISSISSIPPI; SHERIFF  
RANDALL S. TUCKER, in his official capacity; and  
MADISON COUNTY SHERIFF'S DEPUTIES JOHN  
DOES #1 through #6, in their individual capacities,**

**DEFENDANTS**

---

**NOTICE OF DEPOSITION WITH DOCUMENT PRODUCTION**

---

PLEASE TAKE NOTICE that Defendants Madison County, Mississippi and Sheriff Randall C. Tucker, by and through counsel, shall depose the following person, on the date, at the location, and time designated below, upon oral examination by stenographic means, under oath before a duly authorized court reporter or other officer authorized by law to administer oaths under law.

NAME:	RAHUL GUHA, PH.D
DATE:	Wednesday, April 18, 2018
TIME:	9:00 A.M.
PLACE:	Law Offices of Simpson Thacher & Bartlett LLP 425 Lexington Avenue New York, NY 10017 Tel. #: 212-455-3869

The oral examination shall continue from day to day until completed. You are notified to appear and take part in the examination as you deem proper.

Plaintiffs are further commanded to have the deponent have with him at such time any and all items listed in Exhibit "A" attached hereto.

This the 27th day of March, 2018.

s/ Charles E. Ross

Michael B. Wallace (MSB #6904)  
Charles E. Ross (MSB #5683)  
James E. Graves (MSB #102252)  
Charles E. Cowan (MSB #104478)  
T. Russell Nobile (MSB #100682)  
WISE CARTER CHILD & CARAWAY, P.A.  
Post Office Box 651  
Jackson, Mississippi 39205-0651  
Telephone: 601-968-5534  
mbw@wisecarter.com  
cer@wisecarter.com  
jeg@wisecarter.com  
cec@wisecarter.com

Rebecca B. Cowan (MSB #7735)  
CURRIE JOHNSON & MYERS, P.A.  
P.O. Box 750  
Jackson, Mississippi 39205-0750  
Telephone: 601-969-1010  
bcowan@curriejohnson.com

Katie Bryant Snell (MSB# 103607)  
KATIE BRYANT SNELL, PLLC  
P.O. Box 3007  
Madison, Mississippi 39130-3007  
Telephone: 601-460-9800  
katie@katiebryantsnell.com

**ATTORNEYS FOR DEFENDANTS MADISON  
COUNTY, MISSISSIPPI and SHERIFF RANDALL C.  
TUCKER, in his official capacity.**

**CERTIFICATE OF SERVICE**

I, Charles E. Ross, hereby certify that I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following:

Joshua Tom (MSB #105392)  
Paloma Wu (*pro hac vice* forthcoming)  
AMERICAN CIVIL LIBERTIES UNION OF MISSISSIPPI FOUNDATION  
233 East Capitol Street  
Jackson, MS 39201  
(601) 354-3408  
[PWu@aclu-ms.org](mailto:PWu@aclu-ms.org)  
[JTom@aclu-ms.org](mailto:JTom@aclu-ms.org)

Jonathan K. Youngwood (*pro hac vice* forthcoming)  
Janet A. Gochman (*pro hac vice* forthcoming)  
Isaac Rethy (*pro hac vice* forthcoming)  
Nihara K. Choudhri (*pro hac vice* forthcoming)  
Yukiu Chan (*pro hac vice* forthcoming)  
SIMPSON THATCHER & BARTLETT LLP  
425 Lexington Avenue  
New York, NY 10017  
(212) 455-2000  
[jyoungwood@stblaw.com](mailto:jyoungwood@stblaw.com)  
[jgochman@stblaw.com](mailto:jgochman@stblaw.com)  
[irethy@stblaw.com](mailto:irethy@stblaw.com)  
[nchoudhri@stblaw.com](mailto:nchoudhri@stblaw.com)  
[monica.chan@stblaw.com](mailto:monica.chan@stblaw.com)

Ezekiel Edwards (*pro hac vice* forthcoming)  
Jeffery Robinson (*pro hac vice* forthcoming)  
AMERICAN CIVIL LIBERTIES UNION FOUNDATION  
125 Broad Street  
New York, NY 10004  
(212) 549-2610  
[eedwards@aclu.org](mailto:eedwards@aclu.org)  
[jrobinson@aclu.org](mailto:jrobinson@aclu.org)

This the 27th day of March, 2018.

s/ Charles E. Ross  
Charles E. Ross

**EXHIBIT "A"**

Deponent RAHUL GUHA, PH.D., is requested to bring the following documents with him to his deposition to be taken on Wednesday, April 18, 2018, at 9:00 a.m.

1. Your entire file in this matter to include all materials supplied to you by counsel for Plaintiff and any computations, draft reports, notes or other documents prepared by you with regard to this case, your opinions, or your testimony.
2. Any and all billing and time records.